

Telesphere Networks Ltd.  
(formerly Clear Sky Broadband, Inc.)  
4150 N. Drinkwater  
Suite 500  
Scottsdale, AZ 85251

Ms. Marlene H. Dortch  
Office of the Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

November 28, 2005

Re: WC Docket No. 05-196/Compliance Letter (*filed via ECFS*)

Dear Ms. Dortch:

1. Telesphere Networks Ltd. ("Telesphere" – formerly Clear Sky Broadband, Inc.) provides converged network services over a private network (not the public internet) to business customers. Interconnected IP Telephony services are a part of Telesphere's hosted services.
2. As previously reported to the FCC, Telesphere sent the subscriber notification letter to its IP Telephony customers, and obtained affirmative acknowledgments from 100% of those customers that did not have 911 service. Telesphere also distributed the required labels to be placed on IP phones.
3. Telesphere's customers are businesses, some of which have multiple locations around the United States. Currently 22% of Telesphere's IP phones in the United States have 911 service through a combination of POTS lines and automatic routing of 911 calls to the appropriate PSAP.
4. Telesphere has contracted with Qwest for 911 service to all of Telesphere's customers in the State of Arizona. All 911 calls made by such customers will be transmitted to the appropriate PSAP using the Selective Router and the trunk lines between the Selective Router and the PSAP. Automatic number identification (ANI) and automatic location identification (ALI) will be transmitted via the wireline E911 network to all answering points that are capable of receiving and processing this information. All answering points in the areas in which Telesphere customers are located in Arizona are capable of receiving and processing ANI and ALI. Telesphere expects that by March 31, 2006, 100% of customer locations in the State of Arizona will have 911 service in accordance with the VoIP 911 Order, after which approximately 85% of Telesphere's total IP phones in the United States will have 911 service.
5. Telesphere's business customers have locations outside the State of Arizona. Telesphere has been working with Level 3 to provide 911 service to Telesphere's U.S. customers located outside the State of Arizona who do not currently have 911 service. Telesphere intends to continue these discussions with a view to implementing 911 service as soon as practicable to all customer locations in the U.S. Telesphere expects that it will be able to provide 911 service to all such locations by July 1, 2006.

6. Telesphere's customers are businesses with multiple IP phones at each customer location. Telesphere knows the physical address of each customer location and therefore the Registered Location of each IP phone assigned to a given customer location. Telesphere monitors every IP device in its network from a central Network Operations Center. Telesphere is aware if any IP device (including an IP phone) is detached or moved to a new physical location. Customers are not permitted to move an IP phone to a new physical location without Telesphere consent. As a condition to any such consent, Telesphere would require the customer to provide a new physical address that would be the new Registered Location.
7. Nomadic service is not a standard part of Telesphere's service offering. Some individuals that work for our business customers use Telesphere provided software to enable a "soft" phone application on their laptops when they are traveling on business. Generally speaking, such use would be in hotels and other public places that have 911 services available. Telesphere is working with Qwest, which uses Intrado® applications to give nomadic users a web login that enables the user to change his or her physical location whenever a soft phone user is not at their Registered Location.
8. Telesphere will not activate any new customer locations in the United States unless it provides 911 service to such customer location. Such 911 service will be provided through one of the following means: (i) the existing arrangement with Qwest in Arizona; (ii) through Level 3 or Qwest outside of Arizona; or (iii) through a POTs line and router card on the customer premises that will enable any IP phone on a customer's premises to have 911 service in accordance with the VoIP 911 Order.

Sincerely,

Dennis James, Chief Operating Officer

Cc: Mr. Byron McCoy (via e-mail: [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov))  
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